

CT Communications, Inc.  
68 Cabarrus Avenue East  
Post Office Box 227  
Concord, NC 28026-0227

704.722.2500

**ORIGINAL**

EX PARTE OR LATE FILED



Concord  
Telephone

EX PARTE FILING

September 18, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, DC 20554

RECEIVED

SEP 18 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Written *Ex Parte* Presentation  
CPD 97-24 and CC Docket No. 96-98

Dear Ms. Salas:

The attached written ex parte presentation was provided to the Chairman and each of the Commissioners and indicated Commission staff on September 18, 1998. Pursuant to Commission rule 1.1206(b)(1), I am providing to you copies of the ex parte presentation.

If there are any questions, I can be reached at 704.722.2336.

Sincerely,

Jerry L. Weikle  
Manager - Regulatory Affairs

Enclosure

No. of Copies rec'd  
List A B C D E

245

CT Communications, Inc  
68 Cabarrus Avenue East  
Post Office Box 227  
Concord, NC 28026-0227

704 722 2500



September 18, 1998

The Honorable William E. Kennard  
Chairman  
Federal Communications Commission  
1919 M Street, NW, Room 814  
Washington, DC 20554

Re: Interconnection Between LECs and Paging Companies, CPD 97-24;  
Implementation of the Local Competition Provisions of the  
Telecommunications Act of 1996, CC Docket No. 96-98; *Ex Parte*  
Presentation

Dear Chairman Kennard:

CT Communications, Inc. and its subsidiary The Concord Telephone Company ("CTC") are caught in the middle of the LEC/Paging interconnection regulatory quagmire. CTC is a mid-size and rural incumbent local exchange carrier serving approximately 107,000 access lines covering three counties in North Carolina. Currently, paging companies have accrued approximately \$200,000 in unpaid balances to CTC. As a rural LEC, such nonpayment constitutes a financial strain to CTC. The unpaid balance continues to grow. The paging companies' contention that they do not need to pay is based on a strained and unfounded interpretation of FCC rules.

To compound the financial loss to CTC, because of shared facility FX arrangements paging companies have ordered between CTC and BellSouth in Charlotte, NC and because of intercompany settlement arrangements, CTC is required to pay BellSouth tariff rates while the paging companies continue their course of nonpayment. CTC has paid BellSouth close to \$20,000 that has not been reimbursed by paging companies. Combined, CTC is approximately \$220,000 in the red because of nonpayment for state tariffed facilities ordered by paging companies.

The Honorable William E. Kennard  
September 18, 1998  
Page Two

These paging companies have provisioned service from CTC's General Exchange Tariff and BellSouth's General Subscriber Services Tariff as approved by the North Carolina Utilities Commission. Any other regulated service customer would have been rightfully disconnected for nonpayment. However, the paging companies are using an interpretation of FCC rules as an excuse for nonpayment of the amounts they owe pursuant to lawful and binding intrastate tariffs.

CTC is asking for a quick resolution to this regulatory quagmire that ensures compensation to CTC and all LECs for regulated services and facilities utilized by paging companies to operate as for profit companies.

Sincerely,



Jerry L. Weikle  
Manager - Regulatory Affairs

cc: Commissioner Susan Ness  
Commissioner Harold Furchtgott-Roth  
Commissioner Michael Powell  
Commissioner Gloria Tristani  
Thomas Power  
Jim Casserly  
Kevin Martin  
Kyle Dixon  
Paul Gallant  
Kathryn Brown  
James Schlichting  
Jane Jackson  
Ed Krachmer  
Tamara Preiss